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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 IYO, INC.,

Case No. 3:25-cv-04861

19 Plaintiff,

**DECLARATION OF SAM ALTMAN IN
SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF IYO,
INC.'S MOTION FOR A TEMPORARY
RESTRANING ORDER AND
PRELIMINARY INJUNCTION**

20 vs.

21 IO PRODUCTS, INC., OPENAI, INC.,
OPENAI, LLC, SAM ALTMAN, and SIR
JONATHAN PAUL IVE,

Judge: Hon. Trina L. Thompson
Hearing: June 17, 2025 at 10 am

22 Defendants.

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DECLARATION OF SAM ALTMAN

I, Sam Altman, declare:

1. I am a co-founder of OpenAI, Inc., and its Chief Executive Officer. I make this declaration in support of Defendants' Opposition to Plaintiff IYO, Inc.'s Motion for a Temporary Restraining Order and Preliminary Injunction. The facts stated in this declaration are true and correct based on my personal knowledge, and if called and sworn in as a witness, I could and would testify competently to those facts.

8 2. In the summer of 2023, Jony Ive and I decided on the name “io” for a collaboration
9 between our companies to develop a family of devices that would allow people to use AI in new
10 ways. We decided on this name because it is a common phrase for “input/output,” and our intent
11 with this collaboration was, and is, to create products that go beyond traditional products and
12 interfaces. We want to create new ways for people to input their requests and new ways for them
13 to receive helpful outputs, powered by AI. As part of our decision to use the “io” name, we acquired
14 the io.com domain name in August 2023.

15 3. When we chose the name “io” in 2023, I was not aware that Jason Rugolo was doing
16 anything related to AI, nor did I remember ever having seen the company name “iyO.” At no point
17 in time did I ever intend to trade on the “iyO” name. I was surprised to learn of it in 2025, as I do
18 not recall having seen it before.

19 4. Jason Rugolo emailed me out of the blue in March 2025 to request \$10 million in
20 funding. As a courtesy, and given his persistence, I spoke with him and passed his request for a
21 meeting along to the internal and external io team because I thought they could evaluate any
22 opportunities for collaboration. At no time did I tell him that I would acquire his company or that I
23 would sue him for trademark infringement. Perhaps he misunderstood my reference to our
24 ownership of the io.com domain name.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 12th day of June, 2025 at San Francisco, CA.

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4 By: 
5 Sam Altman
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